

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Plaintiff,

-v-

24-MC-2

\$244,430.00 UNITED STATES CURRENCY
SEIZED ON OR ABOUT JULY 13, 2023

EVANS BANK CASHIER'S CHECK #56015,
HAVING A VALUE OF \$35,364.61
SEIZED ON OR ABOUT JULY 13, 2023

EVANS BANK CASHIER'S CHECK #56022,
HAVING A VALUE OF \$42,868.46
SEIZED ON OR ABOUT JULY 13, 2023

ASSORTED JEWELRY SEIZED FROM
VALENCIA JEWELRY INC. ON OR ABOUT
JULY 13, 2023

ONE ROLEX DATEJUST 41MM WATCH WITH
CUSTOM ADDED DIAMONDS SEIZED ON OR
ABOUT JULY 13, 2023,

Defendants in rem.

**STIPULATION TO EXTEND PLAINTIFF'S TIME
TO FILE COMPLAINT IN CIVIL FORFEITURE ACTION**

IT IS HEREBY STIPULATED and agreed upon between the parties, the United States of America by its attorney, Trini E. Ross, United States Attorney for the Western District of New York, Mary Clare Kane, Assistant United States Attorney, of counsel, and Phil Modrzynski Esq., attorney for putative claimant, David A. Zale, that the Plaintiff's time to file its Verified Complaint for Forfeiture be extended from January 11, 2024 to April 11, 2024, pursuant to Title 18, United States Code, Section 983(a)(3)(A).

The parties to this Stipulation further agree that the putative claimant may revoke his consent in writing to extend the time for the government to file its Verified Complaint for Forfeiture against the above-named property, and in that event, the government shall then have fourteen (14) days from the date the government received notice of such action to file its Verified Complaint for Forfeiture.

Dated: January 5, 2024

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TRINI E. ROSS
United States Attorney
Western District of New York

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